

Exhibit 4

*State of California ex. rel. Ven-A-Care of the Florida Keys, Inc. v.
Abbott Laboratories, Inc., et al.*

Exhibit to the Declaration of Steven U. Ross in Support of
Plaintiffs' Opposition to Sandoz, Inc.'s Motion for Summary Judgment

Tooker, Maureen - Vol. I
Sacramento, CA

October 21, 2008

Page 1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

--oOo--

STATE OF CALIFORNIA, ex rel

VEN-A-CARE OF THE FLORIDA KEYS, INC.,

A Florida Corporation,

Plaintiffs,

vs.

MDL No. 1456

ABBOTT LABORATORIES, INC.,

Master File No.

Et al.,

01-12257-PBS

Defendants.

Civil Action No.

_____/ 03-11226-PBS

--oOo--

TUESDAY, OCTOBER 21, 2008

--oOo--

VIDEOTAPE DEPOSITION OF

MAUREEN TOOKER

--oOo--

Reported By: PATRICIA MCCARTHY, CSR No. 12888

Registered Professional Reporter

Tooker, Maureen - Vol. I

October 21, 2008

Sacramento, CA

Page 17

1 contractor negotiated by the policy division.

2 Q. Okay. So it would differ from
3 supplemental rebate to supplement rebate division?

4 A. That's correct.

5 Q. At the time that you made this -- this
6 note, was the pharmacy staff the part of the
7 Medi-Cal program that dealt with supplemental
8 rebates as well?

9 A. Yes.

10 Q. Do you remember what the result was of
11 the investigation that Mr. Miller was going to
12 perform?

13 A. Well, it was the final decision on who
14 would be receiving the AMP data.

15 Q. And I said Mr. Miller, but it -- the
16 note says it's "Craig."

17 A. Craig Miller.

18 Q. Do you understand Craig to mean Craig
19 Miller?

20 A. Yes.

21 Q. Okay. And what was the final decision?

22 A. That EDS would receive the files that

Tooker, Maureen - Vol. I
Sacramento, CA

October 21, 2008

Page 18

1 contained the AMP data from the labelers.

2 Q. And did -- was there any further
3 decision made as to what EDS would do with the data
4 once it received it?

5 A. There were technical decisions made on
6 what would happen to the data once it was arrived.

7 Q. Can you give me an example -- strike
8 that.

9 Do you mean decisions made as to what
10 calculations EDS would perform with the data?

11 A. No. The systems does calculations.

12 Q. Okay. What were the technical decisions
13 that were -- that were made?

14 A. Once the data was brought in, the
15 supervisor of the EDS drug rebate unit would
16 validate that there were no errors, that the format
17 was followed, and then would turn that over to the
18 EDS system's group who would load it into the
19 system.

20 Q. And the system that you are referring to
21 is the RAIS system?

22 A. That is correct.